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Via Federal Express

June 27, 2018

Courtney Avery, Adminstrator
Illinois Health Facilities and Services Review
Board
525 West Jefferson Street, 2nd Floor
Springfield, Illinois 62761

> **Re:**   **Melrose Village Dialysis (Proj. No. 17-029)**
>   **Additional Information**

Dear Ms. Avery:

Polsinelli represents DaVita Inc. and Adiron Dialysis, LLC. (collectively, the "Applicants"). In this capacity, we are submitting additional information regarding the Applicants' proposal to establish a 12-station dialysis clinic in Melrose Park, Illinois (the "Proposed Clinic"). As described more fully below, upon further review of the application for permit, we identified zip codes and their corresponding populations that were excluded from the population calculation in the application for permit and are providing updated information regarding the population within the 30 minute geographic service area ("GSA") of the Proposed Clinic. Additionally, we are providing an updated project completion date. As this letter will not result in any modification listed in Section 1130.650(a) of the Illinois Health Facilities and Services Review Board ("State Board") rules, it constitutes a Type B modification to the pending CON application for Melrose Village Dialysis.

1. Maldistribution of Services

As we prepared to bring the application for the Proposed Clinic forward, we reviewed the ratio of stations to population of the GSA contained on pages 83-85 of the application for CON permit. In reviewing that data, we identified 112 zip codes and their associated populations had been excluded from the population calculation resulting in an error in the overall ratio of stations to population. This ratio is relevant for the determination of the Proposed Clinic's compliance with Section 1110.230(c)(2)(A) of the State Board rules. The population of the relevant geographic service area is nearly two and half times higher than originally identified. We apologize for the data collection issue in the previously submitted information.

Enclosed please find the listing of zip codes that are within the adjusted 30-minute travel time market contour as identified by Microsoft's MapPoint software. Please note that the drive time in Melrose Park is modified pursuant to the State Board rules to account for typical traffic congestion in the area and is 30 minutes/1.15 or 26 minutes. To properly calculate the zip code

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areas within the geographic service area, we pulled the 2010 US Census data and that information is also included herein. What this data shows is that there are 112 zip code areas within the travel time contour. Those 112 zip code areas have 3,403,251 residents within their boundaries and over 25% of the state population resides within 30 minutes of the proposed clinic site. With the State Board's identified 596 dialysis stations, there is a ratio of 1 dialysis station to every 5,710 persons. This calculation shows that there are 47 percent fewer stations per capita in the Proposed Clinic's GSA than the State. See Table 1110.230(c)(2)(A). Additionally, it demonstrates that hemodialysis services in the Proposed Clinic's GSA are less accessible to the population to be served.

Table 1110.230(c)(2)(A) Ratio of Stations to Population				
	Population	Dialysis Stations	Stations to Population	Standard Met?
Geographic Service Area	3,403,251	596	1:5,710	Yes
State	12,978,800	4,818	1:2,694	

2. Updated Project Completion Date

DaVita requests the State Board establish January 31, 2020 as the new project completion date for Melrose Village Dialysis.

Thank you for your consideration of the additional information regarding the Melrose Village Dialysis project. If you have any questions or need any additional information, please feel free to contact me.

Sincerely,

Anne M. Cooper

Attachments

Cc: Gaurav Bhattacharyya

Exhibit 1

Population by Zip Code Melrose Village Dialysis 30 Minute GSA		
Zip Code	**City**	**Population**
60005	Arlington Heights, Mount Prospect	29,936
60007	Chicago, Schaumburg, Elk Grove Village	33,733
60008	Rolling Meadows, Arlington Heights	22,023
60015	Bannockburn, Deerfield, Riverwoods	27,388
60016	Des Plaines, Glenview, Park Ridge	59,726
60018	Chicago, Des Plaines, Rosemont	30,519
60025	Glenview, Golf	39,928
60026	Glenview, Northbrook	14,427
60029	Glenview, Golf	531
60053	Morton Grove	23,413
60056	Mount Prospect, Arlington Heights	55,366
60062	Northbrook, Glenview, Prospect Heights	40,631
60068	Park Ridge	37,567
60070	Prospect Heights, Wheeling	16,195
60077	Skokie	28,281
60090	Wheeling, Prospect Heights	38,045
60101	Addison	39,645
60104	Bellwood	19,010
60106	Chicago, Bensonville, Elmhurst	20,215
60108	Blooming Dale, Keeneyville	22,981
60126	Elmhurst	47,818
60130	Forest Park	14,137
60131	Chicago, Franklin Park, Bensenville	18,072
60133	Hanover Park	38,518
60137	Glen Ellyn, Glendale Heights, Lombard	37,798
60139	Glendale Heights	34,614
60141	Hines	192
60143	Itasca, Medinah	10,372
60148	Lombard, York Center	52,486
60153	River Forest, Maywood, Himes	24,029
60154	Westchester	16,778
60155	Broadview, Hines	7,915
60157	Medinah	2,293
60160	Melrose Park, River Forest, Franklin Park	25,534
60162	Hill Side	8,182
60163	Melrose Park, Berkeley	5,192
60164	Northlake, Melrose Park, Franklin Park	21,700
60165	Melrose Park, Stone Park, Northlake	4,936
60169	Hoffman Estates, Schaumburg	34,058

Population by Zip Code Melrose Village Dialysis 30 Minute GSA		
Zip Code	**City**	**Population**
60171	River Grove, Melrose Park	10,248
60172	Roselle, Schaumburg, Bloomindale, Keeneyville	25,045
60173	Schaumburg	12,246
60176	Chicago, Schiller Park	11,813
60181	Villa Park, Oakbrook Terrace, Elmhurst	28,667
60187	Wheaton	28,662
60188	Carol Stream	43,118
60191	Wood Dale, Addison	14,429
60193	Schaumburg, Hanover Park	40,192
60194	Schaumburg, Hoffman Estates	19,044
60301	Oak Park	2,329
60302	Oak Park	32,258
60304	Oak Park	17,402
60305	River Forest	11,217
60402	Stickney, Berwyn, Lyons, Forest View	63,938
60455	Bridgeview, Bedford Park	16,421
60457	Bridgeview, Hickory Hills	13,858
60458	Justice, Willow Springs	14,887
60480	Willow Springs	5,140
60501	Bridgeview, Bedford Park, Summit, McCook	11,990
60513	Brookfield, Lyons	18,966
60514	Clarendon Hills, Willowbrook	10,260
60515	Downers Grove	28,424
60516	Downers Grove, Woodridge	28,705
60517	Woodridge, Bolingbrook	32,377
60521	Hinsdale	18,103
60523	Oak Brook, Westmont	10,110
60525	La Grange, Indian Head Park, Hodgkins, Countryside, Willow Springs, McCook, La Grange Highlands	31,395
60526	La Grange Park	13,565
60527	Burr Ridge, Willowbrook, Willow Springs, Palisades	28,048
60532	Lisle	27,778
60534	Lyons, McCook	10,571
60546	North Riverside, Forest Park, Broadview, Riverside, Hines	15,837
60558	Western Springs	13,133
60559	Westmont	24,772
60561	Darien	23,042
60601	Chicago	13,695

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Population by Zip Code Melrose Village Dialysis 30 Minute GSA		
Zip Code	**City**	**Population**
60602	Chicago	1,252
60603	Chicago	1,029
60604	Chicago	619
60605	Chicago	26,623
60606	Chicago	3,011
60607	Chicago	28,377
60608	Chicago	78,072
60610	Chicago	38,438
60611	Chicago	31,563
60612	Chicago	35,559
60614	Chicago	69,817
60616	Chicago	52,580
60618	Chicago	95,632
60622	Chicago	54,467
60623	Chicago	88,137
60624	Chicago	38,134
60625	Chicago	79,157
60630	Chicago	57,627
60631	Chicago	28,238
60634	Chicago, Schiller Park, River Grove	73,382
60639	Chicago	90,211
60641	Chicago	70,642
60644	Chicago	49,645
60646	Chicago	27,454
60647	Chicago	88,866
60651	Chicago	61,759
60654	Chicago	17,328
60656	Chicago	27,926
60657	Chicago	70,105
60659	Chicago	38,995
60661	Chicago	9,343
60666	Chicago	O'Hare Airport
60706	Chicago, Norridge, Harwood Heights	23,604
60707	Chicago, Elmwood Park, River Grove	43,451
60712	Lincolnwood	12,637
60714	Niles	29,730
60804	Chicago, Cicero, Stickney	83,972
Total		**3,403,251**

Source: U.S. Census Bureau, Census 2016, American Factfinder
available at *https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml*
(last visited June 26, 2018).